



JAMES E. JOHNSON
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET, Rm. 3-146
NEW YORK, NY 10007

STEPHANIE M. BRESLOW
Senior Counsel
Phone: (212) 356-2660
Fax: (212) 356-3509
sbreslow@law.nyc.gov

July 10, 2020

Via ECF

Honorable Sidney H. Stein
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

MEMO ENDORSED

Re: Candie Hailey-Means v. City of New York, et al.,
17 CV 5374 (SHS)

Your Honor:

I am a Senior Counsel in the Office of James E. Johnson, Corporation Counsel of the City of New York, assisting lead counsel Steve Stavridis with the representation of defendants in the above-referenced matter. Defendants write to inform the Court that while attempting to file a letter motion seeking permission to file an additional exhibit under seal a short while ago, the undersigned accidentally attached to the letter motion – and thus filed publicly – the very same document I was seeking to file under seal, Exhibit CC to the Reply Declaration of Steve Stavridis dated July 10, 2020. This exhibit contains medical records of the plaintiff and thus personal identifying information and confidential medical information regarding plaintiff are now publicly available on the docket. Defendants sincerely apologize for this error and respectfully request that the Court remove Exhibit CC ([ECF No. 130-1](#)) from the public docket as soon as possible.

Sadly, in the midst of filing defendants' reply papers in further support of their motion for summary judgment earlier this evening, Mr. Stavridis suddenly had to attend to a

medical emergency in his family. As a result, I took over the filing process. Unfortunately, I had never filed a motion to file under seal before, and I misunderstood the instructions.

I thank the Court for its consideration of this request.

Respectfully submitted,

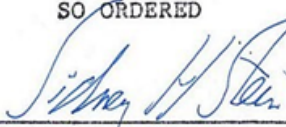
/s

Stephanie M. Breslow
Senior Counsel

cc: **Via ECF**
All Counsel

**Application granted. The Clerk of Court is directed to
strike document no. 130-1.**

**Dated: New York, New York
July 13, 2020**

SO ORDERED


SIDNEY H. STEIN
U.S.D.J.